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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

THE STATE OF CALIFORNIA;  
GAVIN C. NEWSOM, in his Official  
Capacity as Governor of California;  
KAREN ROSS, in her Official Capacity  
as Secretary of the California  
Department of Food & Agriculture;  
ERICA PAN, in her Official Capacity as  
Director of the California Department of  
Public Health; and ROB BONTA, in his  
Official Capacity as Attorney General of  
California,

Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**DECLARATION OF MATTHEW  
DOMINGUEZ IN SUPPORT OF  
PROPOSED DEFENDANT-  
INTERVENORS' UNOPPOSED  
MOTION TO INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025

Time: 9:00 a.m.

Location: First Street Courthouse, 350  
W. 1st Street, Courtroom 7C, 7<sup>th</sup>  
Floor, Los Angeles, California 90012

Trial Date: None

Action Filed: July 9, 2025

**DECLARATION OF MATTHEW DOMINGUEZ IN SUPPORT OF  
PROPOSED DEFENDANT-INTERVENORS' UNOPPOSED MOTION TO  
INTERVENE**

I, Matthew Dominguez, declare as follows:

1. I am the US Director of Compassion in World Farming, Inc. (“Compassion”). I have personal knowledge of the facts set forth in this declaration. The facts set forth are true to the best of my knowledge and recollection. If called, I could and would testify to these facts in a court of law.

2. Compassion has been a Defendant-Intervenor in several similar cases challenging Proposition 12, including one that was eventually decided in the Supreme Court. *N. Am. Meat Inst. v. Becerra*, No. 2:19-cv-08569 (C.D. Cal. Oct. 4, 2019); *Iowa Pork Producers Ass’n v. Bonta*, No. 2:21-CV-09940 (C.D. Cal. Dec. 16, 2021); *Nat’l Pork Producers Council v. Ross*, No. 3:19-cv-02324 (S.D. Cal. Dec. 5, 2019) (lower court decision in favor of Defendants affirmed in *Nat’l Pork Producers Council v. Ross*, 598 U.S. 356 (2023)).<sup>1</sup>

3. Compassion is a nonprofit animal protection organization incorporated in Delaware, with over 250,000 members and supporters, including over 10,000 members and supporters in California.

4. Compassion’s mission is to end factory farming and the most inhumane farming practices. This goal is to be accomplished through public outreach regarding up to date relevant legislative and industry issues, through corporate engagement which pressures companies to engage in higher welfare farming, and by lending support to any regulatory or legislative issues that are relevant to the mission.

5. In effort to get what ultimately became Proposition 12 on the ballot, Compassion sent three employees to California to engage in the collecting of

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<sup>1</sup> In these previous cases, Compassion also used the names “Compassion in World Farming USA” and “Compassion USA.” These monikers all refer to the same organization, which is formally incorporated as Compassion in World Farming, Inc.

1 signatures required for eligibility. Compassion also sent individuals to go door -to-  
2 door in California to create voter awareness about the proposed ballot initiative.

3 6. In the months leading up to the vote, Compassion published numerous  
4 action alerts to its supporters in California, urging them to vote in favor of  
5 Proposition 12. The staff of Compassion also held several interviews and speaking  
6 engagements surrounding its support of the ballot initiative that is the focus of this  
7 lawsuit, and has since participated as a Defendant-Intervenor in two federal cases  
8 challenging Proposition 12. Compassion also participated in the regulatory process  
9 for Proposition 12 by submitting comments.

10 7. If Proposition 12 is struck down, Compassion's efforts would be  
11 undermined and more of its resources would need to be expended elsewhere to  
12 promote other measures to protect farm animals.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the  
14 foregoing is true and correct, based on my own personal knowledge, and as to those  
15 matters, I believe them to be true.

16  
17 Executed this 23rd day of July, 2025, in Brooklyn, NY.

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Matthew Dominguez